

Comments and questions on the Draft Federal Facility Identification Standard:

It is my understanding that the Federal Facility standard will become a part of the existing Facility Data Standard. This will add a series of ownership and operation data elements that should be helpful for non-federal as well as federal facilities.

1. Federal Facility Indicator Code:

Would this include facilities that are privately owned and operated on federal land?

2. Federal Facility Identification Number:

Can a private or state-owned and operated facility have a number analogous to the Federal Facility Identification Number? Presumably so, since many more SDWIS facilities are non-federal than otherwise. If these numbers can be associated with non-federal facilities, this element should be generalized to apply to any facility.

The definition should explicitly differentiate this number from the "Facility Registry Identifier" and the "Environmental System Identification Number." Unless, as the SDWIS example seems to suggest, it is in fact the "Environmental System Identification Number." If it is the "Environmental System Identification Number" then there is no need for this to be a separate element. If it is not the "Environmental System Identification Number" the example should be clarified.

The definition should include a statement that shows this element's relationship to the following element. For example: "An identification number assigned to federal installations **by the source agency specified in the 'Facility Identification Number Context' data element.**"

Is there a difference between an "installation" and a "facility" in this context? If not, use "facility." If so, define and differentiate "installation."

3. Facility Identification Number Context

If data element "2" is the same as the "Environmental System Identification Number," or if the facility identification number can be assigned by other than a federal facility, the examples of permissible values should be expanded.

4. - 9.

This section of the standard applies to any kind of facility and should be renamed: **"Facility Ownership and Operation Information."**

10 & 11 Facility Responsible Agency Name and Code

What does "responsible" mean in this context? Is the agency responsible for operating a facility always the same as the one responsible for environmental compliance or cleanup?

Comments on the Draft Modified Permit Data Standard:

Relationships:

A permit may have one or more permitted features **or processes**.

6. Permit Type:

RCRA Part A and Part B are not permit types. Both are components of the RCRA permit application process. Some examples of RCRA Permit Types are RCRA Operating, RCRA Post-Closure and RCRA Corrective Action.

8. Permitted Feature Type:

The list of permissible values could include RCRA Corrective Action Units: Corrective Action Management Units (CAMUs) or Solid Waste Management Units (SWMUs).